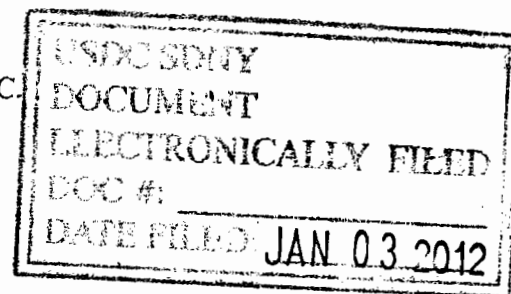


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January 3, 2012

BY FACSIMILE [(212) 805-0426]

The Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: United States v. Daniel Valdez,
\$12 10 Cr. 905 (LTS)

Dear Judge Swain:

This letter is submitted on behalf of Daniel Valdez, whom I represent by CJA appointment in the above-entitled matter, regarding Mr. Valdez's pretrial motions, which are currently due this Friday, January 6, 2012. It is respectfully requested that a brief extension of time to file the motions – until Wednesday, January 11, 2012 – be granted in light of several conflicting deadlines and obligations, and the attendant difficulties in allocating my small firm's resources.¹ In addition, the firm's available resources will be further depleted by a felony trial set

¹ In addition to the pretrial motions due in this case, I also have four additional filings which I must submit to the court on or around January 6, 2012: (1) post-trial motions in *United States v. Javel Taylor*, 11 Cr. 310 (PGG), which cannot be moved because of the jurisdictional nature of the due date; (2) a sentencing letter to Judge John G. Koetl, in a matter in which the client has expressed a strong desire to avoid (another) adjournment; (3) a submission to the Department of Justice in a federal capital prosecution (in a multi-defendant case awaiting DoJ's decisions on authorization); and (4) a detailed written status report to Judge Sidney H. Stein, in advance of a January 9, 2012, court conference, regarding an incompetent client whose 120-day observation period is close to expiration. I also must travel January 4, 2012, to attend a pretrial

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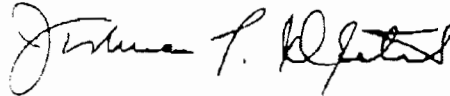
Hon. Laura Taylor Swain
United States District Judge
Southern District of New York
January 3, 2012
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to commence on January 11, 2012, in New York County Supreme Court (and which my partner will be handling).

Lindsay A. Lewis, Esq., an associate attorney in my office, has spoken with Assistant United States Attorney Amie N. Ely, and she has informed Ms. Lewis that the government consents to this application.

Accordingly, it is respectfully requested that an extension until Wednesday, January 11, 2012, be granted for the filing of Mr. Valdez's pretrial motions.

Respectfully Submitted,



Joshua L. Dratel

JLD/lal

cc: Amie N. Ely
Assistant United States Attorney

The request is granted.

SO ORDERED.

NEW YORK, NY

Jan 3, 2012


LAURA TAYLOR SWAIN

UNITED STATES DISTRICT JUDGE

conference in another federal capital prosecution in Islip, New York. I anticipate that conference, involving at least a dozen defendants, will consume at least half that day.